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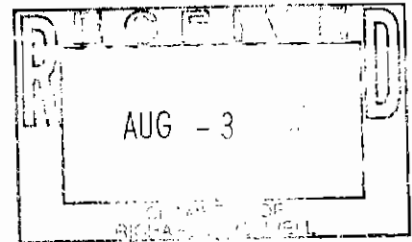
August 3, 2007

BY HAND

Honorable Richard J. Holwell
United States District Judge
United States Courthouse, Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Reid-Thomas v. The City of New York et al
07-CV-06477 (RJH)(DF)

Your Honor:



As the Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, assigned to defend the above-referenced matter, I write to respectfully request that the Court grant defendant City of New York a sixty (60) day enlargement of time to and including October 3, 2007 in which to respond to the complaint. Plaintiff's counsel, Mr. David Zelman, consents to this request.

Plaintiff brings this action pursuant to 42 U.S.C. §1983 alleging, *inter alia* that on June 8, 2007, she was falsely arrested. Based on the foregoing, it is necessary for defendant City of New York to acquire as much information as possible concerning this matter in order to properly assess the case and respond to the complaint. Currently, this office is in the process of forwarding to plaintiff for execution, a consent and authorization for the release of medical records and records sealed pursuant to New York Criminal Procedure Law § 160.50. Defendant cannot obtain these records without plaintiffs' authorization, and without the records, defendant cannot properly assess this case or respond to the complaint. Accordingly, an enlargement of time is necessary so that this office can properly investigate the allegations of the complaint, obtain the underlying documentation and fulfill its obligations under Rule 11 of the Federal Rules of Civil Procedure.

Moreover, a review of the docket sheet indicates that on June 20, 2007, plaintiff filed waivers of service on behalf of Oscar L. Del Valle and Christine Robles. Without making any representations on these individuals' behalf, it is respectfully requested that their time to respond to the complaint similarly be enlarged so that their defenses are not jeopardized while representational issues are being decided. Pursuant to Section 50-k of the New York General Municipal Law, this office must determine, based on a review of the case, whether we may represent each individual. Each individual must then decide whether he/she wishes to be

